



Mark S. Cherry

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ADMITTED TO NJ, PA

and FEDERAL
COURTS

April 26, 2021

Honorable Andrew B. Altenburg
United States Bankruptcy Court
400 Mark Street
Camden, NJ 08103

Re: Pierre and Karen Craig
Case No.: 16-25556-ABA

Dear Judge Altenburg:

Kindly accept this letter in lieu of a more formal objection to the Certification of Debtor's Default that was filed on April 22, 2021 by the Trustee, Isabel Balboa.

The instant case was dismissed in November, 2020 for failure to make trustee plan payments, however, the issue is that there is wage garnishment in place to cover said trustee payment. Debtors were unaware the amount being paid by the employer was not the amount required by the Trustee. Accordingly, the payments were short for quite a while.

Reinstatement of the case took place and Debtors wish to complete the Chapter 13 plan which only have five (5) months remaining. Accordingly, a modified plan was filed yesterday, April 26, 2021 placing the remaining balance to be paid over the remaining 5 months.

Accordingly, I am respectfully requesting that the Certificate of Default be withdrawn as a modified plan has been filed.

Thank you for your courtesy and cooperation regarding this matter.

Very truly yours,
/s/Mark S. Cherry
Mark S. Cherry, Esquire

MSC/dm
Enclosures
Cc: Isabel Balboa (via electronic filing and email)